

1 Jennifer E. Hoekel (NV Bar No. 12775)
2 jennifer.hoekel@huschblackwell.com
3 HUSCH BLACKWELL LLP
4 8001 Forsyth Boulevard
5 St. Louis, MO 63105
6 314-480-1500 Telephone

7 *Counsel for Defendant Johnson Level & Tool*
8 *Mfg. Co.*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 CALCULATED INDUSTRIES, INC., a
12 Nevada corporation,

13 *Plaintiff,*

14 v.

15 JOHNSON LEVEL & TOOL MFG. CO., a
16 Wisconsin corporation,

17 *Defendant.*

Case No.: 3:23-cv-00188-LRH-CLB

**ORDER GRANTING JOINT
STIPULATION FOR EXTENSION OF
TIME FOR DEFENDANT TO RESPOND
TO COMPLAINT**

FIRST REQUEST

1 Plaintiff Calculated Industries, Inc. ("Calculated Industries" or "Plaintiff") and Defendant
2 Johnson Level & Tool Mfg. Co., Inc. ("Johnson Level" or "Defendant"), hereby stipulate and
3 agree, subject to the approval of the Court, to an extension of time of an additional twenty-one
4 (21) days, up to and including June 16, 2023, for Defendant to answer, move or otherwise
5 respond to the complaint in this action, and in support, state as follows:

6 1. Plaintiff filed its Complaint on May 4, 2023 (ECF No. 1).

7 2. Defendant was served via its registered agent on May 5, 2023, and, therefore the
8 operable deadline for Defendant to answer or otherwise respond to the Complaint is May 26,
9 2023.

10 3. Defendant has retained counsel who are currently in preliminary discussions with
11 Plaintiff's counsel, and, therefore, require additional time to investigate the allegations of the
12 Complaint and prepare an answer or otherwise respond to the Complaint.

13 4. The requested extension should not disrupt the schedule in this case or prejudice
14 any party.

15 5. This is the first stipulation for extension of time for Defendant to file its answer,
16 move, or otherwise respond to the complaint in this action.

17 WHEREFORE, the parties hereby stipulate and agree, subject to the approval of the
18 Court, to an extension of time of an additional twenty-one (21) days, up to and including **June**
19 **16, 2023**, for Defendant to answer, move, or otherwise respond to the complaint in this action
20 and for such other and further relief as the Court deems just and proper in the premises.

21 WHEREFORE, the parties further stipulate and agree that the granting of this stipulation
22 shall not be considered a waiver of any rights or remedies belonging to either party.

23
24 IT IS SO ORDERED.

25 

26 UNITED STATES MAGISTRATE JUDGE

27 DATED: May 18, 2023